

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:17-mj-831

COLTON BIGHAM	(01)
ARIEL BROWN	(02)
CHELSEA DUNCAN	(03)
COTY FRANKS	(04)
MICHAEL HIGGINS	(05)
LANDON GASS	(06)
GUILLERMO GARZA	(07)
a/k/a "Billy"	
NICHOLAS GOMEZ	(08)
WILLIAM JOHNSON	(09)
a/k/a "Black Will"	
STEPHEN LEE	(10)
a/k/a "Dirty"	
BRANDON MALASPINA	(11)
KRISTOPHER MILLER	(12)
a/k/a "Kris Miller"	
SUE MOBLEY	(13)
a/k/a "Star"	
TANDYN MORAN	(14)
CAMERON PRIMM	(15)
KORTNEY STEPICH	(16)
ASENCION VELA	(17)
a/k/a "A.V."	

CRIMINAL COMPLAINT

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before January 2016, and continuing until on or about October 26, 2017, in the Fort Worth Division of the Northern District of Texas, and elsewhere, **Colton Bigham, Ariel Brown, Chelsea Duncan, Coty Franks, Michael Higgins, Landon Gass, Guillermo Garza**, also known as Billy, **Nicholas Gomez, William Johnson**, also known as Black Will, **Stephen Lee**, also known as Dirty, **Brandon Malaspina, Kristopher Miller**, also known as Kris Miller, **Sue Mobley**, also known as Star, **Tandyn Moran, Cameron Primm, Kortney Stepich, Asencion Vela**, also known as A.V., along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief, but are not inclusive of all the evidence or information in the case.

I. INTRODUCTION

1. I have been a Special Agent of the DEA for approximately 19 years. I received basic investigative instruction at the DEA Academy located in Quantico, Virginia, and additional continuing instruction regarding investigative techniques. I am assigned to the Fort Worth Resident Office (FWRO) of the DEA, Dallas Field Division, working with Investigators and Officers from the Fort Worth Police Department and the department of Public Safety.

2. I have participated as a law enforcement officer in several drug-trafficking investigations and have conducted wiretap investigations; physical and electronic surveillances; undercover transactions; the execution of search and arrest warrants;

debriefings of informants; and review of taped conversations, text messages, and drug records. Through my training, education, and experience, I have become familiar with the manner in which illegal drugs are transported, stored, and distributed, and the methods of payments for such drugs. I am also familiar with some of the methods by which drug traffickers communicate, using code words commonly used by drug traffickers.

II. SUMMARY OF PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

3. As part of the conspiracy, not every person named or identified in the conspiracy knew every other person identified as being in the conspiracy. It was their joining together for the common purpose of possessing and distributing methamphetamine, the nature of the scheme to possess and distribute methamphetamine, and the overlapping among its members in possessing and distributing methamphetamine that establishes their membership in this particular conspiracy. And not every member of the conspiracy knew the details of each aspect of the conspiracy. Nevertheless, each member of the conspiracy knew or was aware of the conspiracy's general purpose and scope, which was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere between and among the named conspirators and others not named.

4. As part of the conspiracy, its members had a fluid hierarchy that evolved over time. For example, as some members were arrested or otherwise temporarily unavailable, other members took over the receipt and delivery of methamphetamine.

5. Since approximately 2017, the government has been investigating allegations that **Colton Bigham, Ariel Brown, Chelsea Duncan, Coty Franks, Michael Higgins, Landon Gass, Guillermo Garza, Nicholas Gomez, William Johnson, Stephen Lee, Brandon Malaspina, Kristopher Miller, Sue Mobley, Tandy Moran, Cameron Primm, Kortney Stepich, Asencion Vela**, along with Joshua Milson, and Lauren Moore, coconspirators not named as defendants herein, and others not named, have conspired together to possess methamphetamine with the intent to distribute it in the Northern District of Texas and elsewhere.

6. As part of the conspiracy, **Colton Bigham, Ariel Brown, Chelsea Duncan, Coty Franks, Michael Higgins, Landon Gass, Guillermo Garza, Nicholas Gomez, William Johnson, Stephen Lee, Brandon Malaspina, Kristopher Miller, Sue Mobley, Tandy Moran, Cameron Primm, Kortney Stepich, and Asencion Vela**, agreed to possess methamphetamine with the intent to distribute it, and knowingly and willfully participated in that agreement.

7. As part of the conspiracy, the common purpose between and among **Colton Bigham, Ariel Brown, Chelsea Duncan, Coty Franks, Michael Higgins, Landon Gass, Guillermo Garza, Nicholas Gomez, William Johnson, Stephen Lee, Brandon Malaspina, Kristopher Miller, Sue Mobley, Tandy Moran, Cameron Primm, Kortney Stepich, Asencion Vela**, along with others, was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere.

8. As part of the conspiracy, in general, Joshua Milson, Lauren Moore, and others distributed or brokered methamphetamine transactions between and **Colton Bigham, Ariel Brown, Chelsea Duncan, Coty Franks, Michael Higgins, Landon Gass, Guillermo Garza, Nicholas Gomez, William Johnson, Stephen Lee, Brandon Malaspina, Kristopher Miller, Sue Mobley, Tandy Moran, Cameron Primm, Kortney Stepich, Asencion Vela,** and others.

9. As part of the conspiracy, its members routinely received and delivered ounce and multi-ounce quantities of methamphetamine that they then distributed to others in the Northern District of Texas and elsewhere.

10. And as part of the conspiracy, some of the money derived from the sale and distribution of methamphetamine was used to purchase additional quantities of methamphetamine.

III. FACTS ESTABLISHING PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

11. Below is a chronology of some relevant events:

- a. On March 31, 2017, Investigators with the Weatherford/Parker County Special Crimes Unit (SCU) searched Room #116 at the Heritage Inn, located at 1927 Santa Fe Drive, Weatherford, Texas. **Nicholas Gomez** and **Sue Mobley** gave consent to search the room in which Investigators seized methamphetamine and a stolen firearm.
- b. On May 4, 2017, Investigators seized approximately 105 grams of methamphetamine from **Michael Higgins**.
- c. On May 10, 2017, Investigators seized approximately 181 grams of methamphetamine and a Beretta 9mm pistol from **Brandon Malaspina** and **Stephen Lee**.

- d. On May 12, 2017, Investigators seized approximately one (1) kilogram of methamphetamine and approximately \$14, 457 from William Roberts.
 - e. On May 20, 2017, Investigators learned that William Roberts was involved in a motorcycle accident in the 4700 block of Boat Club Road in Fort Worth, Texas, and was killed.
 - f. On April 13, 2017, Investigators learned from **William Johnson** that William Roberts had supplied methamphetamine to **Stephen Lee**.
 - g. On June 26, 2017, **Guillermo Garza** was arrested by the Dallas County Sheriff's Office in possession of approximately 11.9 grams of Xanax and approximately 53.5 grams of methamphetamine.
 - h. On July 5, 2017, Investigators executed a search warrant at the residence of **Stephen Lee** and **Kortney Stepich** and seized approximately 2.9 grams of methamphetamine and 418.2 grams of GHB.
 - i. On July 14, 2017, **Asencion Vela** was arrested by DPS Troopers who seized approximately one (1) kilogram of methamphetamine.
12. In March of 2017, Investigators with the Weatherford/Parker County Special Crimes Unit (SCU) obtained information regarding multiple suspects that were involved in the distribution of large quantities of both Methamphetamine and Gamma Hydroxybutyric Acid (GHB) in the North Texas area. The suspects were identified as **Colton Bigham, Ariel Brown, Chelsea Duncan, Coty Franks, Michael Higgins, Landon Gass, Guillermo Garza, Nicholas Gomez, William Johnson, Stephen Lee, Brandon Malaspina, Kristopher Miller, Sue Mobley, Tandyn Moran, Cameron Primm, Kortney Stepich, Asencion Vela**, and others.
13. On March 31, 2017, as part of an ongoing investigation into a Burglary in which firearms had been stolen, Investigators traveled to the Heritage Inn, room #116, located at

1927 Santa Fe Drive, Weatherford, Parker County, Texas. Upon arrival at room #116, Agents/Officers encountered a subject later identified as **Nicholas Gomez** who stated that there were in fact weapons in his room. **Gomez** then voluntarily granted Investigators consent to enter his room where Investigators encountered a white female identified as **Sue Mobley**, a.k.a. Star, whom **Gomez** identified as his girlfriend. While speaking with **Gomez** and **Mobley**, Investigators were granted consent to search the room, at which time Investigators discovered methamphetamine and a gun, believed to be the stolen weapon. At this time, Investigators interviewed **Mobley** who said **Landon Gass** and **Colton Bigham** recently brought weapons to her room. During the interview, Investigators received consent from **Mobley** to search her phone. While looking through **Mobley**'s text messages, Investigators discovered text messages to and from a subject in **Mobley**'s phone named "Dirty", later identified as **Stephen Lee**. While reviewing the text messages, Investigators observed a large number of text messages discussing both methamphetamine and weapons.

14. On April 13, 2017, Investigators met with **William Johnson**, a.k.a. Black Will, for the purpose of **Johnson** providing information about methamphetamine distribution. During this interview, **Johnson** stated that he and **Stephen Lee** were business partners but had recently parted ways because **Lee** accused **Johnson** of stealing equipment from their business. **Johnson** stated that because of **Lee** stealing the equipment, he (**Johnson**) wanted to reveal to authorities that **Lee** and **Lee**'s girlfriend, who **Johnson** identified as **Kortney Stepich**, were selling large amounts of methamphetamine and GHB. **Johnson**

stated that **Lee** obtains methamphetamine from Will Roberts. **Johnson** stated that **Lee** also gets other illegal drugs from Jade Kuhn. **Johnson** stated that **Lee** frequents an unknown location in Dallas and also frequents Jade Kuhn and **Cameron Primm's** residence in Arlington, identified by **Johnson** as 3408 Ambassador Row, Arlington, Texas, to purchase illegal drugs. **Johnson** stated that he has personally observed **Lee** in possession of approximately seventeen (17) kilograms of methamphetamine in **Lee's** truck, described as a 2010 white Ford F-250. **Johnson** also stated that he has observed methamphetamine and multiple weapons in a safe, which is located in the master bedroom closet, located in **Lee's** and **Stepich's** master bedroom. **Johnson** stated that he believes the weapons to be stolen because the serial numbers have been scratched off the weapons. Furthermore, **Johnson** stated that he was last in **Lee's** residence approximately one (1) week previous to this interview where he observed methamphetamine, GHB, and weapons.

15. On April 13, 2017, Investigators interviewed **Sue Mobley**. During the interview, **Mobley** stated that **Stephen Lee** had previously supplied her with large amounts of methamphetamine and that she has also resided with **Lee** and his girlfriend, **Kortney Stepich**. **Mobley** also stated that she has even been with **Lee** to pick up methamphetamine from different locations. During the interview, Investigators asked for and received written consent to search **Mobley's** cell phone, which was seized from her at the time of her arrest on March 31, 2017. When the phone was examined, Investigators saw numerous text messages regarding illegal drugs and firearm trafficking,

including text messages sent to and received by contacts listed as “**Kortney**”, referring to **Stepich**, “**Dirty**”, referring to **Stephen Lee**, and “**Chedder Bob**”, referring to **Landon Gass**. In addition to the text messages regarding the distribution of illegal drugs, Investigators also observed a photograph of **Lee** posing with a very large piece of a substance that appeared to be methamphetamine, which **Lee** was holding above his head as if it were a crown. In reference to the above-mentioned photograph, **Kourtney Stepich** later admitted this photo depicted a large amount of methamphetamine **Lee** had purchased that day.

16. On April 20, 2017, Investigators re-interviewed **Sue Mobley**. During the interview, **Mobley** stated the day before she was arrested, three subjects she identified as **Landon Gass**, **Colton Bigham**, and another white male that she did not know, had come to her motel room with some guns to trade for illegal drugs. **Mobley** stated **Gass** and **Bigham** told her they wanted to trade the guns for 1 ½ ounces (42 grams) of methamphetamine and fifty (50) Xanax bars. This was corroborated on text messages downloaded from **Mobley**’s phone. **Mobley** said she contacted **Lee** by telephone and he agreed to the deal. **Mobley** said **Lee** sent **William Johnson**, whom she called Black Will, to her motel room to deliver the methamphetamine and Xanax to **Gass** in exchange for the guns. She said the deal was completed and **Johnson** left the room with the guns, leaving the methamphetamine and Xanax with **Gass**, **Bigham**, and the other male subject. **Mobley** stated that on multiple occasions she sold methamphetamine to **Gass**. Additionally, **Mobley** stated that she has previously purchased cocaine from **Gass**.

Mobley said she first met **Stephen Lee** in January 2017. **Mobley** stated that initially, **Lee** was providing her with a quarter-ounce (7 grams) of methamphetamine for \$125 a day, but then that quickly turned into **Lee** delivering $\frac{1}{4}$ pound (4 ounces) of methamphetamine at a time three or four times a day because she had numerous customers. **Mobley** stated that she was obtaining methamphetamine from **Lee** for \$400 per ounce, selling it for up to \$650 per ounce. **Mobley** stated that **Tandyn Moran** and **William Johnson** would routinely bring her methamphetamine at **Lee**'s direction. **Mobley** also stated that **Lee** then introduced her to his girlfriend, **Kortney Stepich**. **Mobley** stated that soon after, **Mobley** and her boyfriend, **Nicholas Gomez**, moved in with **Lee** and **Stepich** at their residence. **Mobley** stated **Lee** and **Stepich** started frequently hanging out with **Ariel Brown**. **Mobley** stated that after a while, **Lee** wanted to introduce **Mobley** to his methamphetamine supply source. **Mobley** said after she and **Gomez** had moved out of the house and moved into a motel room, **Stepich** picked her up from her motel room and took her to **Stepich** and **Lee**'s residence to meet William Roberts. When asked how much methamphetamine **Lee** obtains from Roberts, **Mobley** stated that she has personally weighed out approximately five hundred (500) grams at **Lee**'s residence and that didn't even make a dent in Roberts' supply. **Mobley** stated that when **Lee** wasn't home, **Lee** would give her the key to his safe where he stored methamphetamine for the purpose of distributing the methamphetamine. Additionally, **Mobley** stated that on multiple occasions, **Stepich** would ask **Mobley** to come over to assist **Stepich** with weighing out methamphetamine. **Mobley** said she would travel to

Lee and **Stepich**'s residence, assist **Stepich** in weighing methamphetamine, and would make deliveries to customers **Lee** sent. **Mobley** later stated she knew that **Michael Higgins** obtained large amounts of methamphetamine from **Stephen Lee**. **Mobley** then stated that **Higgins** would distribute the methamphetamine to numerous customers in the Mineral Wells, Palo Pinto, and Parker County areas.

17. On April 20, 2017, Investigators re-interviewed **Nicholas Gomez**. During the interview, **Gomez** requested that **Sue Mobley**, his girlfriend, be present during this interview to assist in his memory. Investigators allowed **Mobley** to be present during the interview. **Gomez** stated that when he accompanied **Lee** to re-supply, they traveled in **Kortney Stepich**'s Kia to a location he believes is the west side of Dallas where they met William Roberts. **Gomez** stated that when they met Roberts, they picked up approximately one (1) kilogram of methamphetamine and a couple of gallons of GHB. **Gomez** stated that once they arrived at the location to meet with Roberts, he (**Gomez**) removed a large duffle bag from the back seat of the Kia. **Gomez** said **Lee** gave the duffle bag to Roberts who then then took the duffle bag, which **Gomez** believed contained a large amount of money, inside of the residence only to return a short time later with what **Gomez** believes was gallons of GHB. **Gomez** stated that he also heard **Lee** ask Roberts about a lock box, and Roberts gave **Lee** a lock box that contained one (1) kilogram of methamphetamine.

18. On May 1, 2017, **Nicholas Gomez** requested to speak with Investigators. **Gomez** stated that sometime in March 2017, he accompanied **Stephen Lee** and **William**

Johnson to a cemetery approximately two hours away. Once arriving at the cemetery, he observed two (2) unidentified males already parked in the cemetery. **Gomez** stated he was instructed to stand by **Lee**'s truck with **Johnson** as **Lee** walked over to the two males where **Lee** provided them with a paper bag **Gomez** suspected contained money. **Gomez** stated that one of the males then took the bag to a vehicle, presumably to count the money. **Gomez** stated that after a short period, the male that took the bag to the vehicle honked the horn, signaling to the other male that the money was correct. **Gomez** stated at that time, the unidentified male that **Lee** was talking to said on the phone with an unknown subject, "We're good...touch down." **Gomez** then stated that a short time later, an airplane flew overhead and did the "tell-tale waving shit" at which time **Lee** stated, "Come on!" **Gomez** stated that **Lee** then instructed **Johnson** to ride with the unidentified male that counted the money in the unidentified male's vehicle. **Gomez** stated that **Lee** and the other unidentified male then got into **Lee**'s truck and **Gomez** drove the truck to a nearby airport. **Gomez** stated that once they arrived at the airport, the airplane that flew overhead had landed and was at the gas pumps. **Gomez** then described the plane as a Bonanza plane, six-seater that was white with dark blue and gold in color stripes. **Gomez** stated that **Lee** jumped out of the truck and went to the plane where he gave **Johnson** a "thumbs up." **Gomez** stated that **Johnson** then got into **Lee**'s truck where **Johnson** instructed **Gomez** to go meet with **Lee**, who was still standing by the airplane. **Gomez** stated that, once at the airplane with **Lee** and the unidentified pilot, **Lee** instructed **Gomez** to ride with the pilot, at which time **Gomez** got into the airplane. **Gomez** stated

that he then flew with the pilot to an airport in Parker County. **Gomez** then stated that once they landed at the airport, **Gomez** unloaded twenty (20) gallons of GHB and a kilo and a half of methamphetamine from the airplane and into **Ariel Brown's** gold Mountaineer, who was already there waiting for **Gomez's** arrival. **Gomez** stated that he and **Brown** then drove to a residence in Justin, Texas, where they delivered ten (10) of the twenty (20) gallons of GHB. **Gomez** then stated that they dropped off the remainder of the GHB and the kilo and a half of methamphetamine at two different addresses in the Fort Worth, Texas, area.

19. On May 4, 2017, Investigators were conducted surveillance at **Stephen Lee's** residence at 1338 Timbercreek Drive. While watching, Investigators observed a white male, later identified as **Michael Higgins**, walking back and forth between **Lee's** residence and a Ford Mustang. Later, Investigators observed **Higgins** depart **Lee's** residence in the Ford Mustang. Investigators maintained surveillance on the vehicle. Investigators then contacted Troopers with the Texas Department of Public Safety (DPS) and requested that Troopers conduct a traffic stop on **Higgins' vehicle**. Shortly after, Troopers performed a traffic stop of **Higgins** near mile marker 415, in Willow Park, Texas. During the stop, Troopers asked **Higgins** for consent to search his vehicle and **Higgins** denied consent. At that time, Troopers contacted their K-9 unit who arrived shortly thereafter. The K-9 alerted on the vehicle, at which time Troopers conducted a search of the vehicle and located approximately a quarter-pound (105.1 grams) of

methamphetamine in the trunk, two cell phones, and some drug notes. **Higgins** claimed ownership of the methamphetamine.

20. On May 10, 2017, Investigators were watching **Stephen Lee**'s residence and observed **Lee** loading multiple backpacks into a Kia. Investigators then observed a subject, later identified as **Brandon Malaspina**, enter the driver's side of the Kia as **Lee** entered the passenger's side. Investigators maintained surveillance on the Kia as it traveled towards Fort Worth on Interstate 20. At the direction of Investigators, a Parker County Sheriff's Office-K9 Deputy conducted a traffic stop on the Kia at the 420 mile marker of Interstate-20, in Aledo, Texas. During the stop, the Deputy made contact with **Malaspina** and had him exit the Kia. The Deputy then asked **Malaspina** for consent to search the vehicle at which time **Malaspina** declined. At this time, the Deputy had **Lee** exit the Kia at which time the Deputy stated that he was going to have his narcotics-detecting dog conduct an open-air search of the Kia. At this time, **Lee** stated to the Deputy that he (**Lee**) was in possession of illegal drugs. The Deputy then conducted the search of the Kia with his dog who alerted on the vehicle. A search of the Kia revealed that **Lee** and **Malaspina** were in possession of approximately 181.3 grams of methamphetamine and a Beretta 9mm handgun.

21. During a subsequent interview with Investigators, **Lee** admitted that he obtained the methamphetamine from a subject he identified by photograph as William Adrian Roberts. **Lee** admitted he lived at 1338 Timber Creek Drive in Weatherford, Texas, and that there was approximately one ounce (28 grams) of methamphetamine, possibly

MDMA, and two (2) shotguns in a safe at his residence. During the interview, **Lee** identified one of his methamphetamine sources as "AV", later identified as **Asencion Vela**. When asked how much methamphetamine he gets from **Vela**, **Lee** stated that he normally gets a kilogram of methamphetamine from **Vela** every 2-3 days and that **Vela** charges **Lee** anywhere between \$8300 and \$9500, per kilogram. During this interview, **Lee** stated that he has purchased approximately fifteen (15) kilograms of methamphetamine from **Vela** since February 2017. **Lee** then stated that he sells **Michael Higgins** approximately a half-pound (eight ounces) of methamphetamine a day and that he (**Lee**) was the one that provided **Higgins** with the methamphetamine that **Higgins** was arrested for on 05-04-2017. **Lee** further stated that he has purchased approximately three (3) kilos of methamphetamine from Jade Kuhn and approximately two (2) gallons of GHB from **Cameron Primm**. Upon completion of the interview, **Lee** accompanied Investigators to his residence. While at the residence, Investigators met with **Kortney Stepich**. She said that upon learning that **Lee** had been stopped by law enforcement, she destroyed the remaining illegal drugs that were left inside their safe that **Lee** admitted to possessing earlier this date, and also concealed two (2) firearms, described as a Winchester 12 gauge shotgun and a Universal Firearms 12 gauge shotgun, in the attic. **Stepich** further stated that she gave **Ariel Brown**, who was at their residence at the time, the remaining weapon in their safe and instructed **Brown** to conceal it at a different location. **Lee** then provided me consent to search his safe, but contraband was not

discovered. Investigators retrieved the Winchester 12 gauge shotgun and the Universal Firearms 12 gauge shotgun from the attic.

22. On May 11, 2017, Investigators learned that William Roberts was staying at the Hampton Inn located at 1718 North Cockrell Hill Road, Dallas, Texas. Upon arriving at the Hampton Inn, Investigators positively identified Roberts' vehicle, a 2007 red Nissan Titan, in the parking lot. While watching the Hampton Inn and the Nissan Titan, Investigators observed Roberts leave the hotel and walk to the Nissan where he retrieved two (2) backpacks from the back seat. Investigators then observed Roberts walk back inside the hotel. While still conducting surveillance on Roberts' Nissan, Investigators observed **Vela's** 2004 gray Jaguar drive through the Hampton Inn parking lot and park in a Sonic Drive-In parking space located in a connected lot with the hotel where Roberts's vehicle was being watched. Investigators could clearly observe **Vela's** Jaguar from their surveillance locations. Investigators then observed **Vela** and an unidentified male walk through the parking lot of the Hampton Inn. Investigators then observed the unidentified male enter room #300 of the hotel. A short time later, Investigators observed **Vela** back at the Jaguar and coincidentally observed a 2017 gray Dodge Challenger park directly next to **Vela's** Jaguar. Investigators then observed **Vela** remove an item from the trunk of the Jaguar and hand it to unidentified occupant(s) of the Dodge Challenger. Shortly after, the Dodge left the parking lot of Sonic. Shortly after, Investigators observed **Vela** get back into the Jaguar and depart the Sonic parking lot. At this time Investigators contacted Officers with the Dallas Police Department (DPD) and requested that they attempt to stop

Vela's Jaguar. When Officers with DPD initiated the traffic stop, **Vela** failed to yield and sped away from the DPD units.

23. On May 12, 2017 at approximately 12:45 a.m., Investigators observed Roberts' vehicle leave the parking lot of the hotel. After the vehicle left the parking lot, Officers with the DPD conducted a traffic stop. During the stop, Officers discovered and seized a lock box that contained approximately one (1) kilogram of methamphetamine and approximately \$14,457. Following the stop and arrest of Roberts, Investigators made contact with a Hampton Inn employee and were informed that Roberts was staying in room #300. When Investigators knocked on the door, a white female, later identified as **Chelsea Duncan**, opened the door. **Duncan** allowed Investigators to enter her room. Once inside, Investigators saw methamphetamine in plain view on a table along with a glass pipe that is commonly used to smoke methamphetamine. When asked who else was staying in this room, **Duncan** stated that William Roberts is also staying in the room but was not present at this time. Investigators then asked **Duncan** for consent to search the room based on the methamphetamine and paraphernalia in plain view. **Duncan** granted consent and also informed Investigators that there were multiple bottles of GHB concealed behind the window curtains. Investigators searched the room where they discovered and seized approximately 31.56 grams of methamphetamine and approximately 14,020 grams of GHB, which were in the bottles concealed behind the curtains. **Duncan** then informed Investigators that **Vela** arrived at their room earlier this

date and she observed **Vela** pull out two (2) large bags of methamphetamine out of his backpack.

24. On June 1, 2017, Investigators watched **Cameron Primm**'s residence. While doing surveillance, Investigators observed a male, later identified as Clarence B. Price, enter **Primm**'s Camaro and drive around the parking lot of the residence. Later, Investigators made contact with Price. While speaking with Investigators, Price said he knows **Cameron Primm** to use methamphetamine and also has knowledge of Jade Kuhn both using and distributing methamphetamine. When asked if **Primm** manufactured and/or sold GHB, Price stated that **Primm** has manufactured GHB in the past.

25. On June 2, 2017, while reviewing information extracted from Price's cell phone, Investigators observed multiple text messages to and from Price regarding the distribution of GHB and other illegal drugs. In addition, Investigators also observed an order confirmation invoice from Sigma-Aldrich, Inc. (order number-3018559066, order date of 05-30-2017, customer account number-49781167, and purchase order number-CC/053017/PRICE) as a downloaded attachment on Price's phone. As Investigators continued to look over the invoice, Investigators observed the contact information to display Price's name and phone number as "Clarence B Price." Investigators then observed the shipping address information to display, "Protech Metals Clarence Price 3609 Smith Barry Rd, Suite 300, Pantego, TX 76013." On the same invoice, the sold-to information displayed, "**Primm**, 7903 Doreen Avenue, Fort Worth, TX 76116" with the ship to information as being, "**Primm** Attn: Accounts Payable 3408 Ambassador Row,

Arlington, TX 76013.” This invoice also showed that approximately \$3102.50 of Hydroxybutanoic Acid Lactone had attempted to be purchased from this business. Through my training and experience, I am aware that Hydroxybutanoic Acid Lactone is used to manufacture GHB.

26. On June 2, 2017, Investigators interviewed Price. During the interview, Price confirmed that **Primm** was a GHB cook and that he has personally been there when **Primm** has cooked a batch of GHB. When asked how much GHB they would cook at a time, Price stated they would make approximately twenty (20) gallons at a time, every other week. When asked how **Primm** cooked the GHB, Price went on to explain that **Primm** could make approximately ten (10) gallons of GHB out of every five (5) gallon of “Lac”, referring to Lactone Acid, and that **Primm** makes 20-25 gallons of GHB at a time. Price also stated that the last time **Primm** cooked GHB was approximately two (2) weeks prior to this interview and that the cook occurred at **Primm**’s neighbor’s duplex. Price then stated that “Lance”, later identified as Christopher Lance Harvey, is the neighbor of **Primm** and that Harvey lives in the duplex behind **Primm**’s residence. Price further stated that they used Harvey’s garage to cook the GHB and that Harvey was present during the cook. Investigators then asked Price where **Primm** gets the lactone, at which time Price stated that **Primm** gets it from a place called Sigma-Aldrich in Milwaukee. Price stated that **Primm** pays for it using prepaid cards using his (Price’s) name and that he (Price) knows **Primm** is using his name for that purpose. Price then stated that **Primm** had recently ordered more lactone from Sigma-Aldrich. Price stated

that the lactone is normally shipped through FedEx. Price also stated that after **Primm** orders the lactone, **Primm** will call FedEx at the last minute before it is delivered and request FedEx to have them take it to their facility in Grand Prairie, off Osler Street, where he (**Primm**) will just pick it up himself.

27. On June 8, 2017, Investigators obtained two (2) cellphones that previously belonged to William Roberts prior to his motorcycle accident and death on May 20, 2017. A successful extraction was performed on the cell phones. Upon review of the extracted contents, Investigators observed multiple text messages to and from phone number used by **Asencion Vela** on numerous occasions. Investigators also observed text messages between Roberts and **Vela** on 05-11-2017 thru 05-12-2017. Roberts provided **Vela** the address of the Hampton Inn located at 1718 N Cockrell Hill Rd, Dallas, Texas 75211, in a text message on 05-12-2017. This is the same day Investigators saw watched **Vela** arrive and leave the Hampton Inn. But when Dallas PD attempted to conduct a traffic stop on **Vela**, he sped away. There's also a text message from **Vela** to Roberts where **Vela** stated, "Speed chase and I got away." However, later this date, Investigators observed Roberts leave the Hampton Inn where he was stopped by DPD and discovered to be in possession of approximately one kilogram of methamphetamine, \$14,457, and GHB. This traffic stop led to the search of Roberts' hotel room #300 where Investigators encountered **Duncan** and discovered 31 grams of methamphetamine and approximately 14,020 grams of GHB.

28. On June 14, 2017, Investigators met with **William Johnson**. During that interview, **William Johnson** stated that **Stephen Lee** took \$10,000 from **Johnson's** business to buy methamphetamine but never returned the money. **Johnson** then stated that **Lee** distributes approximately two (2) pounds of methamphetamine a week and that he (**Johnson**) traveled with **Lee** on four (4) to five (5) occasions to pick up methamphetamine. **Johnson** stated that on two of these occasions **Johnson**, Will Roberts, and **Lee** met with Jade Kuhn and **Cameron Primm** and they (**Johnson**, Will Roberts, and **Lee**) picked up two or more pounds of methamphetamine from Jade on both occasions. **Johnson** stated Jade Kuhn would charge approximately \$3000 per pound of methamphetamine. **Johnson** then relayed going to a shop on Commerce Street in Dallas with **Lee**, for the purpose of purchasing methamphetamine. **Johnson** then explained that he (**Johnson**) served as a driver for **Lee** from March 2017 to April 2017. **Johnson** personally observed Will Roberts count out \$25,000 at Jade Kuhn and **Cameron Primm's** house, plus an additional \$7,000 provided by **Lee** for the purchase of drugs. **Johnson** then confirmed picking a firearm up from **Sue Mobley**, a.k.a. Star, and taking the firearm to **Lee**. **Johnson** then stated that he (**Johnson**) observed **Lee** in possession of approximately seven (7) pounds of methamphetamine and that he (**Johnson**) believed that the methamphetamine came from Will Roberts. Later, Investigators extracted information from **Johnson's** cell phone. After reviewing the extracted information, Investigators observed text messages between **Johnson** and **Coty Franks**, dated in

March 2017, regarding **Johnson** supplying **Franks** with four ounces of methamphetamine.

29. On June 15, 2017, Investigators interviewed **Tandyn Moran**. During the interview, **Moran** admitted that he knew **Lee** was distributing drugs.

Additionally, **Moran** stated that he would occasionally pick up money from multiple customers, at the direction of **Lee** and **Landon Gass**. **Moran** stated that on one (1) occasion, **Mobley** asked **Moran** to take a gun to **Lee**, but that he (**Moran**) refused. Finally, **Moran** stated that **Lee** told him (**Moran**) that **Lee** was getting the methamphetamine for \$5500.00 per kilogram.

30. On June 15, 2017, Investigators interviewed **Coty Franks**. During the interview, **Franks** stated that the most methamphetamine he ever obtained from **Mobley** at one time was approximately one ounce. **Franks** stated that most of the time it was smaller amounts. **Franks** stated **Mobley** would usually give him the drugs, but that **Mobley** would charge **Franks** approximately \$400 for one ounce of methamphetamine. **Franks** stated that the most methamphetamine he ever saw in **Mobley's** possession was a large zip lock bag full.

31. On June 26, 2017, Investigators received information that **Guillermo Garza**, a.k.a. Billy, had been arrested by the Dallas County Sheriff's Office after being pulled over for a traffic offense. **Garza** was found to be in possession of 11.9 grams of Xanax and 53.5 grams of methamphetamine when arrested. At the time of his arrest, **Garza** was in possession of two (2) cell phones.

32. On June 28, 2017, Investigators interviewed **Guillermo Garza**. During the interview, **Garza** admitted to knowing **Asencion Vela** and that he (**Garza**) has personally purchased methamphetamine from **Vela**. **Garza** stated that the most methamphetamine he had purchased from **Vela** is a half-pound and that he (**Garza**) was charge approximately \$4000. **Garza** then admitted to redistributing the methamphetamine to multiple unidentified individuals. **Garza** also stated that he (**Garza**) was residing at a shop located at 1107 West Commerce in Dallas with **Kris Miller**. **Garza** stated that an unidentified person owns the shop, but **Miller** is the one renting it out and allowing him (**Garza**) to stay at the shop. **Garza** stated that he (**Garza**) and **Kris Miller** commonly purchase methamphetamine from **Vela** and that they (**Garza** and **Miller**) commonly possess and distribute methamphetamine from this location. **Garza** stated that **Vela** also met with other customers at the shop and distributed methamphetamine to these customers. Furthermore, **Garza** stated that in the past, **Stephen Lee** traveled to the shop where William Roberts would meet **Lee** outside. Roberts would then come inside the shop, obtain methamphetamine from **Vela** and then take it back out to **Lee**. When asked, **Garza** stated that **Lee** met **Vela** through Roberts and that the most methamphetamine he has seen **Vela** in possession of was approximately three (3) kilograms.

33. On July 5, 2017, Investigators executed a search warrant at the residence of **Stephen Lee** and **Kortney Stepich**, located at 1338 Timbercreek Drive, Weatherford, Texas. During the search of the residence, Investigators located and seized multiple

items, to include approximately 2.9 grams of methamphetamine and approximately 418.2 grams of GHB. While executing the search warrant, Investigators located and detained **Ariel Brown**. While being detained, **Brown** was interviewed by Investigators. During the interview, **Brown** positively identified **Stephen Lee** and **Kortney Stepich** and stated she (**Brown**) had been living with them for several weeks. **Ariel** said that her friend **Sue Mobley**, a.k.a. Star, originally introduced her to **Lee** and **Stepich**, because they (**Lee** and **Stepich**) were supplying **Mobley** with methamphetamine. **Brown** then advised that she had been to the "shop" with **Stepich** and **Lee** to pick up drugs and that she (**Brown**) observed **Lee**'s friend, **Kris Miller**, at the shop. **Brown** then admitted to smoking methamphetamine that she had obtained from **Mobley** prior to **Mobley**'s arrest. **Brown** stated that after **Mobley**'s arrest, she (**Brown**) began purchasing methamphetamine from **Stepich**. **Brown** stated that **Lee** had asked her to be a runner for him (**Lee**), but that she didn't do it. **Brown** later admitted that she did make a delivery of methamphetamine for **Mobley** and that **Mobley** bought her food as payment. **Brown** then stated that the night that **Stepich** gave her a gun to hide, **Brown** was aware that **Lee** had been arrested and **Stepich** gave her a rifle to hide so **Lee** didn't get into more trouble. **Brown** said she hid the gun from law enforcement and brought it back when **Lee** told her to bring it back. **Brown** stated that she (**Brown**) and **Stepich** hid the GHB that was in the master bathroom of the residence. **Brown** said **Stepich** needed money and they had the GHB but knew that **Stephen** would give it away. **Brown** said they hid the GHB so that it wasn't given away and they could sell it later to make money.

34. On July 5, 2017, Investigators interviewed **Stephen Lee**. Prior to the interview, Investigators had extracted data from several cellular phones that were previously seized from **Lee**. Investigators noted that several text-message conversations between **Lee** and other associates indicated **Lee** was involved the distribution of large quantities of methamphetamine and GHB in the North Texas area. **Lee** stated that he found out on July 4, 2017, that Garret Blair was anticipating receiving a shipment of Lactone. **Lee** stated that Blair has a T-Shirt business that allows Blair to procure the chemical legitimately. **Lee** stated that prior to the date of this interview he (**Lee**) had been at Van Stone's residence, located on Rosser Square in Dallas. **Lee** stated that at that time, Stone was in possession of some purple-colored methamphetamine and that **Lee** knows "purple dope" is a trademark, indicating the methamphetamine originated from **Vela**. **Lee** stated that while at Stone's house, **Lee** observed that one of the many phones lying around the house had fallen down in front of **Lee** and that **Lee** noticed the screen was locked but that a number appeared on the screen that had a contact for **Vela**.

35. **Lee** stated that he was able to meet **Cameron Primm** and obtain GHB from **Primm** and Jade Kuhn through his best friend Will Roberts. **Lee** stated that the GHB seized by Investigators from Will Roberts on May 12, 2017, was purchased by Will Roberts from **Primm**. **Lee** stated that he knew this because **Lee** knew that **Primm** was Roberts' GHB source of supply. **Lee** stated that

Roberts previously told **Lee** that prior to Roberts' arrest, Roberts was in

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possession of approximately seven gallons of raw lactone. **Lee** stated that despite Investigators observing **Vela** at Roberts' hotel on the night of the seizure, any GHB seized would only have come from **Primm**, because **Primm** was Roberts' and **Lee**'s GHB source of supply. **Lee** then described that he (**Lee**) had been present when **Primm** had "cooked" the GHB. **Lee** stated that Roberts eventually learned how to manufacture the GHB but that **Primm** could only procure the chemicals (lactone).

36. **Lee** stated that Kuhn typically supplies methamphetamine and **Primm** supplies GHB. **Lee** stated that Roberts was a huge drug dealer and that prior to obtaining methamphetamine from **Vela**, **Lee** and Roberts would primarily purchase methamphetamine from Kuhn. **Lee** stated that Roberts and **Lee** were selling so much methamphetamine that Roberts and **Lee** eventually found a cheaper source for the methamphetamine in **Vela**. **Lee** stated that Roberts reported to **Lee** that Roberts and Kuhn were quarreling prior to Roberts' arrest and that this was the reason why Roberts was purchasing methamphetamine from **Vela** on the night of Roberts' arrest. **Lee** stated that he (**Lee**) and Roberts would purchase a kilo of methamphetamine from Kuhn at the price of \$8500, but that they could purchase the same amount from **Vela** for \$8300. **Lee** stated that he (**Lee**) never needed to go through Roberts to purchase methamphetamine from **Vela** and that he (**Lee**) could do his own purchases.

37. **Lee** agreed that most of the drugs purchased from him by **Sue Mobley** and **Nick Gomez** were eventually redistributed by **Mobley** and **Gomez**. **Lee** stated that **Lee** would sell one (1) ounce of methamphetamine for \$350.00. **Lee** stated that **Sue Mobley** distributed a large quantity of methamphetamine for **Lee** and that she (**Mobley**) and her boyfriend, **Nicholas Gomez**, actually lived with **Lee** and **Stepich** prior to **Mobley** and **Gomez**'s arrest.

38. **Lee** stated that the methamphetamine seized from **Michael Higgins** on May 4, 2017, was originally obtained from **Lee**. Additionally, **Lee** stated that he (**Lee**) knew **Mobley** would supply methamphetamine to **Landon Gass**.

39. **Lee** stated that **Tandyn Moran** purchased multi-ounce quantities of methamphetamine from **Lee**. **Lee** stated that he met **Kris Miller** and **Guillermo Garza**, a.k.a. Billy, through **Will Johnson**. **Lee** stated that he hadn't purchased methamphetamine from **Garza** for approximately one month prior to the date of this interview. **Lee** stated that on July 4, 2017, while at **Kris Miller**'s shop, he (**Lee**) observed chemicals and manufacturing apparatuses in the shop used for manufacturing GHB, including a 500 ml flask, portable cook tops, PH tester, and several other items that belonged to **Will Roberts**. **Lee** stated he knows the equipment belonged to **Will Roberts**.

40. Additionally, **Lee** stated that while he (**Lee**) was at the shop, he (**Lee**) talked to a female who was waiting to receive nine ounces of methamphetamine

from **Vela**. **Lee** stated that he (**Lee**) knows Van Stone to be a quarter-pound to a half-kilogram methamphetamine dealer.

41. On July 6, 2017, Investigators interviewed **Kortney Stepich**. During the investigation, Investigators extracted data from several cellular phones associated with **Stepich**. The cell text-message conversations between **Stepich** and other associates indicated **Stepich** was involved in buying and selling large quantities of methamphetamine. Investigators asked **Stepich** to explain some of the messages and identify codefendants. **Stepich** confirmed the drug messages between her and **Sue Mobley**. The messages were originally downloaded to this case from **Sue Mobley's** phone that was seized in March 2017.

42. **Stepich** stated that she did not know about the GHB that was found at her house by Investigators during the execution of the search warrant. **Stepich** stated that **Ariel Brown** usually keeps her (**Brown's**) narcotics in the bathroom where the GHB and methamphetamine was found. **Stepich** did state that she knew methamphetamine residue was in the safe at her house. **Stepich** confirmed that on May 10, 2017, she flushed methamphetamine down the toilet once **Stepich** knew that the police would be coming to her house and that she had **Ariel Brown** hide one of the guns that was at the house. **Stepich** stated that **Brandon Malaspina** currently gets methamphetamine from Lindsay Carlson and that she (Carlson) distributes out of her parents' house. **Stepich** stated that she recently went with **Lee** to **Kris Miller's** shop and that **Kris Miller** is mad at **Vela**.

43. On July 17, 2017, Investigators arrested **Tandyn Moran**. Following the arrest, Investigators interviewed **Moran**, and he acknowledged that he knew **Lee** was obtaining pounds of methamphetamine but that **Moran** was not involved in selling. **Moran** stated that he never sold the methamphetamine that **Lee** gave him, describing himself instead as an intermediary. **Moran** stated that he has observed **Lee** give **Johnson** a quart-sized bag half-filled with methamphetamine to **Johnson** on approximately two or three occasions. **Moran** stated that he has been asked to collect money from **Mobley** on several occasions. **Moran** stated that he knew **Lee** would pay for **Mobley** to stay at motels.

44. On July 14, 2017, **Asencion Vela** had been arrested by Troopers with the Texas Department of Public Safety (DPS) on an outstanding warrant. At the time of his arrest, **Vela** was also found to be in possession of approximately one (1) kilo of methamphetamine. Following his arrest, Investigators interviewed **Vela**. **Vela** stated that although he knows **Stephen Lee**, **Kortney Stepich**, and William Roberts, he never sold them any illegal drugs. Investigators then confronted **Vela** about the night Investigators observed him at the Hampton Inn in Dallas on May 11, 2017, where Investigators were watching Roberts. **Vela** acknowledged that he was at the Hampton Inn that evening and the reason he was there was because he purchased eight (8) ounces of methamphetamine from Roberts. **Vela** also admitted to running from Dallas Police when they attempted to stop him after he left the Hampton Inn. **Vela** stated that he didn't stop for the police because he (**Vela**) possessed eight (8) ounces of methamphetamine.

45. On July 14, 2017, Investigators interviewed **William Johnson**. **Johnson** stated that he had been obtaining between two and three ounces of methamphetamine a week from **Stephen Lee**. **Johnson** stated that he (**Johnson**) mainly supplied the methamphetamine to a customer that he identified as **Coty Franks**.

46. On July 26, 2017, **Coty Franks** was arrested on an outstanding arrest warrant. Following his arrest, Investigators interviewed **Franks**. **Franks** stated that he never obtained methamphetamine from **William Johnson** because he was afraid of him. **Franks** did admit to purchasing methamphetamine from **Sue Mobley**.

47. On July 27, 2017, Investigators arrested **Chelsea Duncan** and Aaron Wayne Fisher on outstanding arrest warrants. During an interview, **Duncan** admitted that she had knowledge of the methamphetamine and GHB that was discovered in her hotel room and also admitted that she observed **Asencion Vela** sell Roberts approximately one (1) kilogram of methamphetamine. **Duncan** stated that Roberts has provided her methamphetamine in the past that Roberts purchased from **Vela**. **Duncan** then admitted to selling some of the methamphetamine obtained by Roberts from **Vela**.

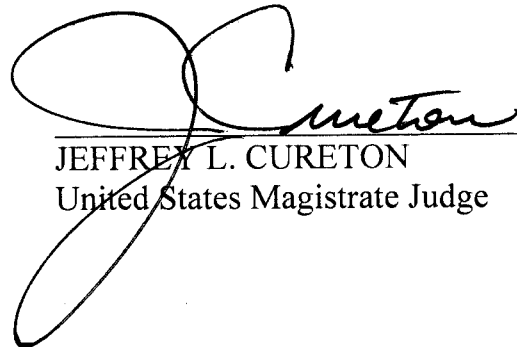
48. **Duncan** further admitted that she started selling methamphetamine more frequently after Roberts' death and would purchase methamphetamine from **Guillermo Garza**. **Duncan** stated that she knew **Garza** purchased his methamphetamine from **Vela**. **Duncan** then stated that she also knew **Cameron Primm** and that **Primm** taught Roberts how to manufacture GHB. **Duncan** stated that once Roberts learned how to manufacture GHB, he would Manufacture GHB at **Kris Miller's** shop.

49. Based on the foregoing, the Complainant believes that probable cause exists that **Colton Bigham, Ariel Brown, Chelsea Duncan, Coty Franks, Michael Higgins, Landon Gass, Guillermo Garza, Nicholas Gomez, William Johnson, Stephen Lee, Brandon Malaspina, Kristopher Miller, Sue Mobley, Tandyn Moran, Cameron Primm, Kortney Stepich, Asencion Vela**, along with others both known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B), namely to distribute and to possess with intent to distribute more than 50 grams of methamphetamine, in violation of 21 U.S.C. § 846.



Brian Finney
Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 2:35 am/pm, this 26th day of October, 2017 in Fort Worth, Texas.



JEFFREY L. CURETON
United States Magistrate Judge